



CITY OF PULLMAN

Public Works and Planning Departments

325 S.E. Paradise Street, Pullman, WA 99163
(509) 338-3220 or (509) 338-3213 Fax (509) 338-3282

www.pullman-wa.gov

April 21, 2009

Municipal Permit Comments
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Department of Ecology,

The city of Pullman appreciates Ecology's attempt to ease the burden of Eastern Washington communities faced with implementing the NPDES Phase II Municipal Permit by "reviewing proposals that would reduce costs of permit compliance including, but not limited to, extending interim deadlines in the permit". The city of Pullman wholeheartedly supports extending all the interim deadlines within the permit to February 2012. However, for the city to avoid continued imposition of an onerous stormwater utility fee on the Pullman community, we request that the expiration date of the permit be moved from February 2012 to February 2014. Only this will provide the relief we so desperately seek for our residents and businesses in these difficult economic times.

There are many requirements related to developing and implementing new programs in the NPDES Phase II Municipal Stormwater Permit. This will take time, additional staff and in some cases expensive equipment to accomplish. Simply pushing the deadlines back a year or two within the existing timeframe, does not provide the meaningful relief we are requesting. All of the tasks must still be accomplished before February 2012 and most require years of preparation. With less than three years remaining in the permit cycle, time is not on our side.

The city expects to incur significant additional costs to comply with all the elements contained within the permit. However, we anticipate that the pollution prevention and good housekeeping element (S5B6) will likely require the greatest effort. Comprehensive inventory, inspections and maintenance of the city's stormwater infrastructure as required in the permit (twice before February 2012!) will constitute a major undertaking for us and be challenging to meet under the current compliance schedule. The following is an estimate of the extent of Pullman's stormwater facilities (all figures exclude WSU):

- 62 miles of streets
- 1200 catch basins
- 900 manholes
- 37 miles of storm drain lines
- 14 miles of natural drainage (creeks & ditches)
- 80 known outfalls to creeks & river
- 95+ public & private detention ponds/swales

The good housekeeping and pollution prevention element is just one example of an additional service the city must now provide to its citizens. The cost of providing this service will be passed on to the Pullman community at one of the worst times imaginable with respect to our local economy.

We realize Ecology has valid reasons for not extending the permit expiration date to February 2014. We would hope that some consideration be made for the valid reasons (and the people that are being affected) behind our request to grant the extension. Thank you for the opportunity to comment on this very important issue affecting our community.

Sincerely,



Rob Buchert
Stormwater Services Division
Program Manager